



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



Memorandum

DEC 12 2007

To: Service Directorate

From: Acting Director

Kenneth Stansell

Subject: Update on Integrated Pest Management and Pesticide Use Proposals

This memorandum and corresponding attachments update the Director's September 9, 2004, Memorandum and Guidance titled *Integrated Pest Management Plans and Pesticide Use Proposals: Updates, Guidance, and an Online Database*.

Although pesticides are an important tool for managing many pest species, including invasive species, prevention strategies are critical to prevent infestations from occurring. Prevention is the best line of defense, and prevention techniques save the Service time and money.

Continued Collaboration. Over the past few years, field, regional, and Washington Office (WO) staffs have collaborated to promote Integrated Pest Management (IPM) activities by Service personnel through the following: 1) updating IPM and pesticide policies; 2) offering training in IPM and invasive plant management; 3) updating and streamlining the Pesticide Use Proposal (PUP) process, including the development of an online PUPs database for entering PUPs and tracking pesticide usage and other IPM practices; and 4) allowing 5-year approvals of PUPs with pesticides that have a low probability of adversely affecting non-target organisms or the environment.

National PUP Database. In 2007, we launched the online national IPM and PUP database (<https://sds.fws.gov/pups/>). Regions that currently use the PUPs database acknowledge the benefits over the paper-based PUP system. The database is automated, streamlined, and allows for PUP duplication and multi-year PUP approval. Additionally, the PUP transmission and review times have drastically decreased and, we worked to delegate more pesticide review authority at the regional level (revised list attached, <https://intranet.fws.gov/contaminants/WordDocs/Wolistfinal.doc>). For pesticides applied in calendar year 2008, all stations with adequate Internet connections must submit their PUPs online. The database automatically forwards PUPs to the appropriate reviewer.

Updated Department of Interior IPM Policy. On May 31, 2007, the Department of Interior (DOI) finalized the revised 517 DM 1, Integrated Pest Management Policy, replacing the 1981 Pesticide Use Policy (attachment). A team of representatives from DOI's land management agencies, along with U.S. Geological Survey and the Office of Environmental Policy and Compliance, developed the revised policy. The DOI IPM policy is consistent with contemporary science and authorities and addresses all pest management tools, including pesticides. The revised policy reaffirms that all managers on Department lands must manage pests in a manner that



reduces risks from both the pests and any associated pest management activities, in compliance with all applicable authorities. You will find the updated policy on the Internet at (<http://www.fws.gov/contaminants/IPM/DOI517DM1.pdf>).

Multiple-Year Approvals of PUPs Requiring WO Review. PUPs requiring WO review may receive up to 5 year approvals if they meet the following criteria: (1) the pesticide use is adequately addressed in an approved IPM plan (or similar approved management plan such as a Habitat Management Plan or Comprehensive Conservation Plan) that satisfies Service IPM planning requirements (see Director's Memorandum, September 2004); (2) field station staff enter PUPs, which are associated with the IPM plan, in the online PUPS database, and the PUPs are accurate, complete, and comply with all applicable authorities (e.g., Section 7 of the Endangered Species Act); (3) each year the field station staff must report actual pesticide use, using the online database or other mechanism; (4) conditions specified in the PUP (e.g., site, application rate, pest species) cannot substantially change over time to render the PUP inapplicable; and (5) each year the field station staff must ensure the proposed pesticide usage is consistent with the current product label as legally mandated through the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

IPM plans for pesticides that require WO review require approval by the National IPM Coordinator. The National IPM Coordinator will grant these approvals in consultation with the Regional IPM Coordinator, Refuges Environmental Contaminants Coordinator and, as necessary, with refuge staff when IPM requirements are in Habitat Management Plans (HMPs) or similar refuge plans. Approval of all other IPM plans will occur at the Regional level. Field or Regional staff can attach these plans in the online PUPs database.

Multiple-Year Approvals of PUPs Requiring Field Level Review. Regions may allow station managers to grant 5-year approvals of PUPs requiring review at the field station level if they meet the following criteria: (1) field stations must enter PUPs that receive 5-year approvals into the online PUPs database the first year; (2) field stations must submit actual pesticide usage reports to their regions each year (through the PUPs database or other mechanism); (3) all appropriate compliance documents must coincide with the 5-year PUP approval (i.e, intra-Service section 7 consultations must include 5 years of the proposed use in the description of the proposed action); (4) site conditions specified in the PUP (e.g., site, application rate, pest species, etc.) cannot substantially change over time to render the PUP inapplicable; (5) each year the field station is responsible for ensuring the proposed pesticide usage is consistent with the current product label as legally mandated through FIFRA.

IPM and Pesticide Safety. In accordance with the Pesticide User Safety policy (242 FW 7), Service personnel involved in IPM and pesticide use should get the appropriate training and certification. Additionally, the Department of the Interior's Integrated Pest Management Policy (517 DM 1) states "...persons applying pesticides, releasing biological control agents, and conducting other IPM activities have the appropriate training and equipment necessary to ensure their safety and health and to act in full conformance with this policy." The National Conservation Training Center currently offers three courses annually to help us meet our training needs: *Principles of Integrated Pest Management, ECS315*; *Field Techniques for Invasive Plant Management, WLD2139*; and *Pesticides and Fish and Wildlife Resources, ECS3119*.

You can find most of the documents referenced in this memo and other IPM and pesticide information on the Service's IPM website at (<http://www.fws.gov/contaminants/Issues/IPM.cfm>). If additional information is required, please contact Roger Helm, Chief, Division of Environmental Quality at 703-358-2148, or Linda Lyon, Refuges Environmental Contaminants Coordinator at 703-358-2381.

Attachments